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August 25, 2014

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O’Rielly
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: MB Docket No. 14-57

Dear Chairman and Commissioners:

As the nation’s largest and oldest Hispanic civil rights organization advocating for the interests of more than 54 million Latinos in the United States and Puerto Rico, the League of United Latin American Citizens (LULAC) encourages the Federal Communications Commission to consider Comcast’s track record of working with the Latino community to advance important goals of broadband adoption, community investment, governance, programming and workforce and supplier diversity when reviewing the proposed Time Warner Cable transaction.

One of the key advancements in community engagement with corporations in recent years was the unprecedented Memorandum of Understanding (MOU) negotiated with Comcast as part of their joint venture with NBCUniversal. The MOU, which leading Latino organizations signed, reflected an historic agreement of commitments aimed toward achieving new diversity benchmarks in corporate governance, workforce development, employment, procurement, programming, philanthropy, and community investments.

As a member of the external National Hispanic American Advisory Council working with Comcast’s internal Diversity Council, I have witnessed the implementation of commitments under this MOU over the past three years. In our opinion the MOU has been an outstanding success and it is become the standard that we have used in discussions with other companies ever since. Comcast has delivered on every promise in the MOU and has worked with us to go beyond the MOU commitments. The company has increased the amount of business conducted with diverse suppliers and deliberately worked to expand the diversity of their employees. Comcast’s intention to build on its record by extending the benefits of its MOU commitments to Time Warner Cable markets should not be overlooked by the Commission.

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Chairman Tom Wheeler

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LULAC can attest to the great impact of the Internet Essentials broadband adoption program and the benefit this program would bring to communities in the Time Warner Cable footprint. Over 1.4 million low-income Americans have already been connected to home broadband through Internet Essentials, and expanding this effort is a valuable step toward closing the digital divide, especially because Time Warner Cable did not pursue the Connect2Compete program past the pilot stage, leaving the majority of their subscribers without a similar low cost option. LULAC has been proud to partner with Comcast providing digital literacy trainings to families with the Internet Essentials program, as well as with programs including Digital Connectors, and collaborative efforts with other community based organizations like the Latin American Youth Center, based here in Washington, D.C. Latino families in cities like New York City, Los Angeles, San Antonio and Dallas will benefit with a low-cost broadband option to help families get online at home for educational and employment purposes. In our opinion, helping more low income and diverse families get online is the single most important success coming out of the MOU and we hope that the program will continue to be enhanced and extended.

It should be noted that Comcast has committed to investing hundreds of millions of dollars a year to enhance the service and reliability of the Time Warner Cable systems. That will mean faster broadband service and superior video options, as well as economic development and jobs. Regional and larger businesses will also benefit from a new national competitive option. After LULAC successfully petitioned to have Comcast cable brought into our headquarters building, our Internet speeds increased 10 fold and our bill dropped in half.

Comcast has also pledged to extend its open Internet commitment to the Time Warner Cable territories that it acquires. While the Commission is addressing this issue on an industry-wide basis in a separate rulemaking, that process will ultimately raise legal issues and may be pending in the courts for quite some time. The Comcast pledge is binding and will protect the open Internet immediately.

Comcast has been a strong and committed partner to the League of United Latin American Citizens. We urge the Commission to consider Comcast's record for corporate social responsibility, the impact the merger will have on broadband adoption, and the company's commitment to the Latino community when reviewing this transaction.

Sincerely,

Brent Wilkes

LULAC National Executive Director